SWIDLER BERLIN SHEREFF FRIEDMAN, LLP.

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October 14, 1999

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VIA OVERNIGHT DELIVERY

K. David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243

Re: @link Networks, Inc. (Docket #99-00663)

Dear Mr. Waddell:

Enclosed for filing on behalf of @link Networks, Inc. ("@link") in the above-referenced docket are an original and thirteen (13) copies of @link's responses to the October 1, 1999 data requests of Commission Staff.

A. Technical

- 1. Provide the following information concerning the network it proposes to provision in Tennessee:
 - a) Geographic area to be served -i.e., cities.

@link plans to provide local exchange service in all areas in Tennessee that are served by BellSouth Telecommunications, Inc. ("BellSouth") and United Telephone, Southeast, Inc. ("Sprint"). Initially, @link initially intends to offer service in Chattanooga, Knoxville, Memphis and Nashville.

- b) Location of switches -i.e., cities.
- @link initially will provide data only service. @link currently does not plan to install switches in the State of Tennessee.
 - c) How the network will be deployed.
- @link proposes to provide service in Tennessee utilizing leased facilities (unbundled network elements) of other carriers, including BellSouth and Sprint, and/or through the resale of the services of other carriers. Specifically, for its initial offering of high-speed data service, @link intends to lease unbundled network elements for DSL loops. As described in more



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detail in @link's application, @link initially will deploy xDSL technology to provide high-speed, high quality data connections. xDSL are point-to-point deployment technologies that allow multiple forms of data, voice, and video to be carried over standard twisted pair copper, or UNEs, on the local loop between the central office and consumer site. @link has executed negotiated interconnection agreements with BellSouth and Sprint so that it may commence its proposed Tennessee operations upon certification and Authority approval of the interconnection agreements.

- 2. Provide information indicating whether a telecom engineering firm is on retainer, and/or whether any electrical engineers are on staff.
- @link does not have a telecom engineering firm on retainer. As indicated in its initial application, @link's managerial and technical team includes several members with a strong background in electrical engineering. For example, as detailed in @link's application at Exhibit 2, @link's Chief Technology Officer, Douglas Zolnick, holds a degree in electrical engineering and has over 13 years of experience in the telecommunications industry, including expertise in the areas of multi-service access, transmission, core switching, transparent LAN service, Frame Relay, ISDN, BISDN, SONET, SDH, cell relay, circuit emulation, Internet access and distribution, and ATM, LAN/V LAN switching/routing technologies. William L. Edwards, @link's Chief Scientist, has 18 years of experience in applied research, network architectures, protocols and broadband access, and has worked for Sprint, Bell Labs, Pac Bell and the Independent Telecommunications Network. Mr. Edwards has a BS in mathematics from Brigham Young University, a MS and a MBA from National University, and a Ph.D. in Mathematical Physics from U.S. International University. Chris Brown, @link's Director of Network Operations, holds certifications for Xylan Omniswitch, Cisco router configuration (both basic and advanced), CascadeView, and Cascade Frame Relay configuration, and has worked with NT OC-48, NT DMS-250 switching, Alcatel 3139 and 21130 and is a certified Ciena WDM administrator. In short, @link's technical team is highly qualified and has a great deal of telecommunications experience.
- 3. State whether Tennessee customers will be required to purchase CPE which cannot be used with ILEC systems, should the customer decide to go back to the ILEC.
- @link's Tennessee customers will not be required to purchase any equipment. All equipment needed to provide data service will be leased by customers.

- 4. Provide information regarding the current facilities in Tennessee and facilities that are expected to be built in Tennessee.
- @link plans to lease facilities in connection with its provision of service in Tennessee, and currently does not plan to construct any facilities in Tennessee.

B. Financial

1. Provide the cost of the proposed network, switches, or unbundled network elements (UNEs), etc.

As noted above, @link currently does not plan to construct any facilities in Tennessee. Instead, @link plans to lease unbundled network elements ("UNEs") in connection with its provision of service. Attached hereto under seal as Attachment A are @link's projected expenses through the year 2002. This information is confidential and commercially sensitive. Accordingly, Applicant has marked this information "CONFIDENTIAL" and respectfully requests that the information not be divulged to the public.

2. Provide current audited financial statements, if audited F/S are available, including an income statement, balance sheet, and statement of cash flows.

Attached hereto under seal as Attachment B are @link's audited financial statements for the years ended May 31, 1999 and May 31, 1998. This document contains confidential and proprietary information and has been marked "CONFIDENTIAL." @link respectfully requests that this information not be divulged to the public.

Please note that these financial statements do not reflect a more recent substantial equity investment in @link. Specifically, subsequent to the issuance of the attached audited financial statements, Madison Dearborn Partners, Inc. (a leading private equity firm) led an equity investment in @link totaling \$45 million in order to fuel the @link's rapid growth.

3. Provide projected financial statements, including income statements, balance sheets, and cash flow statements for the next three (3) years.

Attached hereto under seal as Attachment C are @link's revenue and cash flow projections through the year 2002. (As indicated above, @link's projected expenses through the year 2002 are attached under seal as Attachment A. This information is confidential and

commercially sensitive and has been marked "CONFIDENTIAL." Applicant respectfully requests that this information not be divulged to the public.

4. Provide details of the funding for the proposed network, equipment purchases, or payment for UNEs such as: (a) Internally generated funds (cash, marketable securities); (b) Letters of credit; (c) Loan commitments; (d) Vendor credit; and (e) Provide a three (3) year capital budget outlining the specific equipment to be deployed, where it will be deployed, and its cost. This should cover Tennessee operations, as well as the parent company (or whoever is responsible for financing the Tennessee operation). Also, provide the sources of capital.

@link currently does not plan to construct any facilities in Tennessee. Instead, @link plans to lease unbundled network elements ("UNEs") in connection with its provision of service. Please see Attachment C (@link's revenue and cash flow projections through the year 2002) and Attachment A (@link's projected expenses through the year 2002), which include projections for the cost of UNEs. (These documents are confidential and commercially sensitive and has been marked "CONFIDENTIAL.") Also, as discussed above, subsequent to the issuance of @link's most recent audited financial statements, Madison Dearborn Partners, Inc. (a leading private equity firm) led an equity investment in @link totaling \$45 million. This investment will fuel the @link's rapid growth so that @link may expand its territory and service offerings.

5. Indicate whether the financial statements reflect any amounts related to reciprocal compensation for terminating ISP traffic and quantify these amounts, if any.

The attached financial statements do not reflect any amounts related to reciprocal compensation for terminating ISP traffic.

C. Additional Information

1. Provide a certificate of service stating the application has been served on all eighteen (18) incumbent local exchange telephone companies in Tennessee and a statement confirming that service.

Please see Attachment D.

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2. Notarized pre-filed testimony is required for CLEC applications. The testimony should describe the services to be provided, the applicant's technical, managerial, and financial abilities to provide the services, and affirm that all information submitted is true and correct.

Please see Attachment E.

- 3. State the procedures the applicant has taken to ensure Y2K compliance, or the status of the applicant's Y2K plan.
- @link is Y2K compliant today. (@link completed its Y2K readiness preparations in July and August of 1998.)
- 4. Applicant should file its tariff subsequent to the application's approval (tariffs filed with the application are information only, not official filings).
 - @link will file its tariff upon approval of application.
- 5. Provide a Wireline Activity Report to the TRA on a monthly basis if furnishing voice grade service.
- @link initially plans to offer only data services in Tennessee. (However, @link requests authority to provide the full range of local exchange and interexchange services so that it may expand its operations in the future as market circumstances may warrant.) In the future, if and when @link provides voice grade service in Tennessee, @link will provide a Wireline Activity Report to the TRA to the extent required by the TRA.
- 6. State whether @link Networks, Inc. requires a customer deposit. If so, provide the amount required. State whether the applicant is bonded for the amount of the deposits.
- @link may require customers to make a service deposit if the Customer has not established its creditworthiness to the satisfaction of the company. The maximum deposit may be required up to two (2) months total bill (including toll and taxes). For an existing customer, a maximum deposit may be required up to the total actual bills of the highest two consecutive months within the preceeding six (6) months.

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Please date-stamp and return to the undersigned the extra copy of this filing in the prepared envelope provided herein. Should you have any questions, please do not hesitate to contact Brian McDermott at (202) 295-8346.

Very truly yours,

Katherine A. Rolph Brian McDermott

Counsel for @link Networks, Inc.

cc: Mary Jo Grant

300715.1

Attachments

Attachment A Projected Expenses Through the Year 2002

Attachment B Audited Financial Statement

Attachment C Projected Revenue and Cash Flow Through the Year 2002

Attachment D Certificate of Service

Attachment E Prefiled Testimony

Attachment A

Projected Expenses

[Confidential and Proprietary]

Attachment B

Audited Financial Statements

[Confidential and Proprietary]

Attachment C

Projected Cash Flow and Revenue

[Confidential and Proprietary]

Attachment D

Certificate of Service

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NOTICE OF APPLICATION

TO:

All Tennessee Incumbent Local Exchange Carriers

FROM:

Katherine A. Rolph, Esq.

Brian McDermott, Esq.

DATE:

October 14, 1999

RE:

Application of @link Networks, Inc. for a Certificate of Public Convenience and

Necessity to Provide Local Exchange and Interexchange Telecommunications

Services Throughout the State of Tennessee

This is to notify you that the above-referenced telecommunications application was filed with the Tennessee Regulatory Authority on September 3, 1999. A copy of the application may be obtained from the Authority.

Attachment E

Prefiled Testimony

CERTIFICATE OF SERVICE

I, Jeannie Wisemiller, hereby certify that on this 14th day of October 1999, a copy of the

foregoing notice was served via first class U.S. Mail on the following:

Terry Wales, General Manager Ardmore Telephone Company, Inc. P.O. Box 549 517 Ardmore Avenue Ardmore, TN 38449

DeWitt Ezell, President BellSouth 333 Commerce Street Nashville, TN 37201-3300

David Dickey, Division Manager Century Telephone of Adamsville P.O. Box 405 116 N. Oak Street Adamsville, TN 38310

Don Ray Fannon, Division Manager Century Telephone of Claiborne P.O. Box 100 507 Main Street New Tazewell, TN 37825

Terry Crutchfield, Division Manager Century Telephone of Ooltewah-Collegedale, Inc. P.O. Box 782 5616 Main Street Ooltewah, TN 37363

Alice Camuti, Director Citizens Communications Company P.O. Box 689 250 South Franklin Street Cookeville, TN 38501 Louise Brown, President Loretto Telephone Company, Inc. P.O. Box 130 Loretto, TN 38469

W.S. Howard, President Millington Telephone Company, Inc. 4880 Navy Road Millington, TN 38053

Steve Parrott, Director-Regulatory Affairs Sprint-United 112 Sixth Street Bristol, TN 37620

Jerry R. Parkerson, Manager TDS Telecom-Concord Telephone Exchange, Inc. P.O. Box 22610 701 Concord Road Knoxville, TN 37933-0610

Bernard R. Arnold, Manager TDS Telecom-Humphreys County Telephone Company P.O. Box 552 203 Long Street New Johnsonville, TN 37134-0552

Carl Lester, Manager TDS Telecom-Tellico Telephone Company, Inc. P.O. Box 9 102 Spence Street Tellico Plains, TN 37385–0009 TDS Telecom-Tennessee Telephone Company P.O. Box 18139 Knoxville, TN 37928-2139

TEC-Crockett Telephone Company, Inc. P.O. Box 7 Friendship, TN 38034

TEC-People's Telephone Company, Inc. P.O. Box 310 Erin, TN 37061

TEC-West Tennessee Telephone Company, Inc. P.O. Box 10 244 E. Main Street Bradford, TN 38316

United Telephone Company P.O. Box 38 120 Taylor Street Chapel Hill, TN 37034

Detober 14, 1999

Attachment E

Prefiled Testimony

BEFORE THE TENNESSEE REGULATORY AUTHORITY

In the Matter of the Application of)	
)	
@link Networks, Inc.)	
)	
for a Certificate of Convenience and)	
Necessity to Provide Local Exchange)	Docket No
and Interexchange Telecommunications)	
Services Throughout the State of Tennessee)	

TESTIMONY OF DEBORAH AMBRUSO

ON BEHALF OF

@LINK NETWORKS, INC.

INTRODUCTION

- 1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
- 2 A. My name is Deborah Ambruso. My business address is @link Networks, Inc., 20825
- 3 Swenson Drive, Suite 150, Waukesha, Wisconsin 53186.
- 4 Q. WHAT IS YOUR POSITION WITH @LINK NETWORKS, INC.?
- 5 A. I am the Regulatory Compliance Manager of @link Networks, Inc. ("@link").
- 6 Q. PLEASE DESCRIBE YOUR BUSINESS EXPERIENCE AND BACKGROUND.
- 7 A. I have been in the telecommunications industry for eight years. Prior to joining @link, I was
- 8 employed by WorldCom for five years as a Manager and Major Account Sales
- 9 Representative. While employed by WorldCom, I was responsible for production and
- profitability in the area of sales. I received a Bachelor of Science Degree from the University
- of Wisconsin.
- 12 Q. ARE YOU FAMILIAR WITH THE APPLICATION THAT WAS SUBMITTED BY
- 13 @LINK NETWORKS, INC. TO THE TENNESSEE REGULATORY AUTHORITY
- 14 ("AUTHORITY") ON SEPTEMBER 3, 1999 FOR A CERTIFICATE OF PUBLIC
- 15 CONVENIENCE AND NECESSITY TO PROVIDE LOCAL EXCHANGE AND
- 16 **INTEREXCHANGE SERVICES?**
- 17 **A.** Yes, I am.
- Q. DO YOU RATIFY AND CONFIRM THE STATEMENTS THAT ARE MADE IN
- 19 **@LINK'S APPLICATION?**
- 20 **A.** Yes, I do.

1		II.
2		PURPOSE AND SUMMARY
3	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?
4	A.	I submit this testimony on behalf of @link to demonstrate that @link's application for a
5		Certificate of Public Convenience and Necessity to provide facilities-based and resold local
6		exchange and interexchange telecommunications service meets the appropriate regulatory
7		criteria and is in the public interest. I will also explain the services that @link proposes to
8		offer in Tennessee.
9	Q.	PLEASE SUMMARIZE THE MAIN POINTS OF YOUR TESTIMONY.
10	Α.	My testimony will address several major issues:
11		• a description of @link's application for a Certificate of Public Convenience and
12		Necessity to provide local exchange and interexchange services;
13		• a description of @link's managerial and technical qualifications;
14		• a description of @link's financial qualifications;
15		• a description of the specific services @link proposes to offer in Tennessee; and
16		• a demonstration that @link's proposed services are consistent with the public
17		interest.
18 19	Q.	PLEASE DESCRIBE THE AUTHORITY THAT @LINK SEEKS FROM THE COMMISSION.
20	A.	@link seeks a Certificate of Public Convenience and Necessity to provide local exchange
21		and interexchange telecommunications services. @link proposes to provide data transmission

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services over its leased facilities, through the use of unbundled network elements purchased

from other certificated carriers and through the resale of services of other licensed carriers.

@link intends to deploy xDSL technology to provide high-speed, high quality data
connections.

4 Q. HAS @LINK BEEN AUTHORIZED TO PROVIDE LOCAL EXCHANGE SERVICES IN ANY OTHER JURISDICTIONS?

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A.

Yes. @link Networks, Inc. (formerly known as Dakota Services, Ltd.), is authorized to provide telecommunications service in Alabama, Arkansas, California, Colorado, Connecticut, Illinois, Indiana, Kansas, Kentucky, Massachusetts, Michigan, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New York, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, Texas, Vermont, and Wisconsin. Applicant also is authorized to provide data telecommunications service (on an unregulated basis) in Iowa and Wyoming. @link currently provides services in Wisconsin and Illinois. @link has pending applications for authority to provide telecommunications service in the District of Columbia, Arizona, Delaware, Florida, Georgia, Idaho, Louisiana, Maine, Maryland, Minnesota, Nevada, North Carolina, North Dakota, Oregon, South Dakota, Utah, and West Virginia, and is in the process of obtaining authority to provide telecommunications services in New Mexico, Virginia, and Washington. Applicant is authorized to provide advanced telecommunications services as a Federal Data IXC through a tariff filed with the Federal Communications Commission on March 31, 1998. @link has not been denied requested certification in any jurisdiction, nor has it had a permit, license, or certificate revoked by any authority.

1		III.
2		LEGAL QUALIFICATIONS
3	Q.	PLEASE DESCRIBE THE CORPORATE STRUCTURE OF @LINK.
4	A.	@link is a corporation organized under the laws of the State of Wisconsin. @link is a
5		wholly owned subsidiary of @link Holdings, Inc. ("@link Holdings"), a Delaware holdings
6		company with principal offices located in Waukesha, Wisconsin.
7	Q.	IS @LINK LEGALLY AUTHORIZED TO DO BUSINESS IN TENNESSEE?
8	A.	Yes. A copy of @link's authorization to transact business in Tennessee is attached as
9		Exhibit 1 to @link's application.
10		IV.
11		MANAGERIAL AND TECHNICAL QUALIFICATIONS
12 13	Q.	PLEASE OUTLINE @LINK'S MANAGERIAL AND TECHNICAL QUALIFICATIONS.
14	A.	@link has the technical and managerial qualifications necessary to provide customers in the
15		State of Tennessee with high-quality, high speed data transmission services. @link's
16		management team collectively has a wealth of experience and expertise in the
17		telecommunications industry. Exhibit 2 to @link's application sets forth the backgrounds
18		and experience of @link's officers and key management personnel. The management team's
19		experience and expertise in the telecommunications industry have allowed @link to deploy
20		a network footprint by collocating equipment in 150+ central office switch sites and
21		transporting that traffic over high-speed connections to a remote switching center.

FINANCIAL QUALIFICATIONS

Q. PLEASE DESCRIBE @LINK's FINANCIAL QUALIFICATIONS.

A. @link is financially qualified to provide local exchange and interexchange telecommunications services within Tennessee. @link has access to the financing and capital necessary to conduct the telecommunications operations as specified in its Application. A copy of @link's most recent financial statements are attached to @link's application as Exhibit 3.

A.

VI.

@LINK's PROPOSED SERVICES

Q. PLEASE DESCRIBE THE TYPE OF SERVICE THAT @LINK WILL OFFER IN TENNESSEE.

@link initially intends to target its marketing efforts at business customers with a need for affordable, high bandwidth, high performance, high speed Internet and Intranet data connections. Specifically, @link will offer DS1, DS3 and xDSL services. @link will provide these services using its xDSL networks, which utilize existing telephone lines and infrastructure, but allow for the transmission and receipt of data at 50 to 200 times the speed of modems currently used in the marketplace. @link plans to deploy an intrastate, fault tolerant, survivable ATM backbone in Tennessee which will counter any downtime that any one central office or customer may encounter. @link has determined that the most cost effective method of developing its networks is to create a Point of Presence ("POP") in areas with population densities of 40,000 or greater.

Although @link does not plan to offer any voice services initially, we are requesting
authority to provide all forms of local exchange and interexchange services so that we can
avoid having to amend our Certificate in the event that we decide to offer voice services in
the future.

@link will offer its services pursuant to tariff on a non-discriminatory basis. The proposed services will be available on a full-time basis, 24 hours a day, seven days a week.

Q. WHAT FACILITIES WILL @LINK USE TO PROVIDE ITS PROPOSED LOCAL EXCHANGE AND INTEREXCHANGE SERVICES?

A. @link will provide service by maintaining collocation facilities and through the use of dark fiber unbundled elements purchased from other carriers and, in the future, through the resale of services of other carriers.

12 Q. WHAT GEOGRAPHIC AREAS WILL @LINK SERVE?

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13 **A.** @link seeks authority to provide facilities-based and resold local exchange and interexchange services throughout the State of Tennessee, and initially plans to provide service in the existing service areas of BellSouth and Sprint.

16 Q. WHAT CUSTOMER CLASS WILL @LINK SERVE INITIALLY?

- 17 **A.** @link will serve both business and residential customers.
- 18 Q. PLEASE DESCRIBE @LINK'S RATE STRUCTURE.
- 19 A. @link's proposed rates are set forth in the Tariff submitted as Exhibit 6 to its application.

1 2	Q.	WILL @LINK'S TARIFF CONTAIN ALL OF ITS RATES AND CHARGES AS REQUIRED FOR INTRASTATE TELEPHONE SERVICES?
3	A.	Yes. All rate elements will be set forth in a readily ascertainable form. @link's tariffs will
4		list specific rate levels for each service and service element and will otherwise comply with
5		the Commission's Rules.
6		VII.
7		PUBLIC INTEREST CONSIDERATIONS
8 9 0	Q.	DOES @LINK HAVE A SMALL AND MINORITY-OWNED TELE-COMMUNICATIONS BUSINESS PARTICIPATION PLAN, AS REQUIRED PURSUANT TO T.C.A. § 65-5-212?
1	A.	Yes. @link submitted its Small and Minority-owned Telecommunications Business
.2		Participation Plan to the Authority as Exhibit 5 to its application on September 3, 1999.
.3	Q.	HAS @LINK DESIGNATED A PLAN ADMINISTRATOR WHO WILL BE
.4		RESPONSIBLE FOR ADMINISTERING @LINK'S SMALL AND MINORITY-
.5		OWNED TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN?
.6	A.	Yes. Mary Jo Grant will administer @link's Small and Minority-Owned
.7		Telecommunications Business Participation Plan. Ms. Grant may be reached at 20825
.8		Swenson Drive, Suite 150, Waukesha, Wisconsin 53186, telephone (414) 717-2000.
.9 20 21	Q.	PLEASE DESCRIBE THE PUBLIC INTEREST BENEFITS ASSOCIATED WITH @LINK'S PROPOSED OFFERING OF TELECOMMUNICATIONS SERVICES IN TENNESSEE.
22	A.	Grant of @link's Application will further the public interest by expanding the availability to
23		Tennessee consumers of technically advanced telecommunications facilities and services.

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 $@link's\ data\ network\ will\ utilize\ state-of-the\ art\ technology.\ @link's\ presence\ in\ the\ market$

will afford consumers an additional choice of telecommunications providers and services.

The public will benefit both directly, through the use of the high-quality and reliable digital transmission services to be offered by @link, and indirectly because the expanded competition that @link will introduce will increase the incentives for other telecommunications providers to operate more efficiently, offer more innovative services, reduce their prices, and improve their quality of service. Grant of @link's Application will advance the public interest by further enhancing the service options available to Tennessee citizens.

9 Q. WILL THE PROVISION OF THE PROPOSED TELECOMMUNICATIONS SERVICES COMPLY WITH THE AUTHORITY'S REQUIREMENTS?

A. Yes. @link will comply with the applicable rules, policies and statutes governing its provision of the proposed telecommunications services or will request waivers where compliance would be burdensome and unnecessary in the competitive marketplace.

1		VIII.	
2		CONCLUSION	
3	Q.	DOES THIS CONCLUDE YOUR TESTIMONY?	
4	A.	Yes, it does.	
		Deborah Ambruso	
		Regulatory Compliance Officer @link Networks, Inc.	
	Subs	scribed and Sworn to me this day of October, 1999.	
	Nota	ary Public	
	Му	Commission Expires:	

VIII.

CONCLUSION

- Q. DOES THIS CONCLUDE YOUR TESTIMONY?
- A. Yes, it does.

Deborah Ambruso

North Central Regional Wholesale Manager

@link Networks, Inc.

Subscribed and Sworn to me this 12th day of October, 1999.

Notary Public

My Commission Expires: February 16, 2003.

NOTARY PUBLIC PUBLIC